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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

WEN LIU,

Plaintiff,

09 Civ. 9663 (RJS) (AJP)

-against-

NOTICE OF MOTION

MOUNT SINAI SCHOOL OF MEDICINE AND
AGENTS, JEFF COHEN, JUAN WISNIVESKY,
KAREN JOHNSON, JACQUELINE ARCINIEGA,
VAISHALI PATEL, and ABIOLA FASINA,

Defendants.

PLEASE TAKE NOTICE that upon the annexed Declaration of Rory J. McEvoy, Esq., sworn to on September 30, 2011, and the exhibits thereto; the Declaration of Julie L. Sauer, Esq., sworn to on September 30, 2011, and the exhibits thereto; the accompanying memorandum of law; and all prior proceedings had herein, Defendants The Mount Sinai Hospital, Jeff Cohen, Juan Wisnivesky, Karen Johnson, Jacqueline Arciniega, Vaishali Patel, and Abiola Fasina (collectively "Defendants"), will move this Court at the United States Courthouse, 500 Pearl Street, New York, New York 10007, on a date and time to be designated by the Court, for an order granting Defendants' motion to dismiss the Complaint, with prejudice, and granting such other and further relief, including costs and attorneys' fees, as this Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order, dated August 17, 2011, Plaintiff shall serve any opposing affidavits and answering memoranda by October 31, 2011.

Dated: New York, New York
September 30, 2011

EDWARDS, ANGELL, PALMER & DODGE LLP

By: 

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